

**KANTROWITZ, GOLDHAMER & GRAIFMAN**

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*Proposed Liaison Counsel*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

|  | <b>Document Filed Electronically</b> |
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| CHARLES J. GALLIC, Derivatively on Behalf<br>of MEDAREX, INC., | )                                    |
|  | )                                    |
| Plaintiff,   | )                                    |
| v.   | )                                    |
|  | )                                    |
| MICHAEL A. APPELBAUM, RANDALL T.                               | )                                    |
| CURNOW, YASHWANT M. DEO,                                       | )                                    |
| DONALD L. DRAKEMAN, LISA N.                                    | )                                    |
| DRAKEMAN, PATRICIA M. DANZON,                                  | )                                    |
| IRWIN LERNER, NILS LONBERG, W.                                 | )                                    |
| BRADFORD MIDDLEKAUFF, RONALD J.                                | )                                    |
| SALDARINI, CHRISTIAN S. SCHADE,                                | )                                    |
| CHARLES R. SCHALLER and JULIUS A.                              | )                                    |
| VIDA,  | )                                    |
|  | )                                    |
| Defendants,  | )                                    |
|  | )                                    |
| and  | )                                    |
|  | )                                    |
| MEDAREX, INC.,   | )                                    |
|  | )                                    |
| Nominal Defendant.   | )                                    |
|  | )                                    |

(Additional Captions Follow)

**PLAINTIFFS CHARLES J. GALLIC AND JACK AND MARILYN  
FRIEMAN'S: (1) CROSS MOTION TO CONSOLIDATE CASES, APPOINT  
LEAD PLAINTIFFS AND CO-LEAD AND LIAISON COUNSEL;  
AND (2) OPPOSITION TO THE MOTION TO CONSOLIDATE AND APPOINT  
PETER G. BEIDLER LEAD PLAINTIFF AND APPOINT LERACH  
COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP LEAD COUNSEL**



Peter G. Beidler, Derivatively on Behalf of )  
MEDAREX, INC., ) Civil Action No. 06-cv-0516 (FLW) (TJB)  
 )  
 Plaintiff, )  
 v. )  
 )  
 IRWIN LERNER, DONALD L. )  
 DRAKEMAN, CHRISTIAN S. SCHADE, )  
 RONALD J. SALDARINI, NILS LONBERG, )  
 W. BRADFORD MIDDLEKAUFF, )  
 CHARLES R. SCHALLER, PATRICIA M. )  
 DANZON, JULIUS A. VIDA, MICHAEL A. )  
 APPELBAUM, ROBERT C. DINERSTEIN, )  
 and ABHIJEET J. LELE, )  
 )  
 Defendants, )  
 )  
 and )  
 )  
 MEDAREX, INC., )  
 )  
 Nominal Defendant. )  
 )

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**TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that on March 19, 2007 at 10:00 a.m., or as soon thereafter as the matter may be heard, proposed lead plaintiffs Charles J. Gallic, Jack Frieman and Marilyn Frieman ("Movants") shall cross move this Court before Honorable Freda L. Wolfson, Courtroom 5E, Clarkson S. Fisher Federal Building, 402 E. State Street, Trenton, New Jersey for an order: (i) consolidating all pending and subsequently-filed derivative stock option backdating actions on behalf of nominal party Medarex, Inc.; (ii) appointing Movants Lead Plaintiffs; and (iii) appointing Stull, Stull & Brody and Weiss & Lurie Co-Lead Counsel and Kantrowitz, Goldhamer & Graifman, as Liaison Counsel.

The motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Aaron L. Brody filed herewith, the pleadings and other files herein, and such other written or oral argument as may be permitted by the Court.

DATED: March 5, 2007

Respectfully submitted,

s/ *Gary S. Graifman*  
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